

UNITED STATES DISTRICT COURT  
THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Court No. 7:20-cv-528
	)	
v.	)	
	)	
\$40,000.00 HELD BY BANK OF	)	
AMERICA’S HOLD HARMLESS/RISK	)	
TEAM,	)	
	)	
Defendant.	)	
	)	

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Now comes the plaintiff, United States of America, by and through its attorney, Krista Consiglio Frith, Assistant United States Attorney, and brings this Complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF THE ACTION**

1. This is a civil action *in rem* brought to forfeit and condemn certain personal property assets to the use and benefit of the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(A) and/or (D), for violations of 18 U.S.C. §§ 1957 and 1343.

**THE DEFENDANTS *IN REM***

2. The defendant property consists of approximately \$40,000.00 that was located in Enigma Business Group Bank of America Checking Account No. 334059744938 and is now held by Bank of America’s Hold Harmless/Risk Team.

**JURISDICTION AND VENUE**

3. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) because acts giving rise to this forfeiture occurred in this district.

6. Upon the filing of this Complaint, Plaintiff requests the Court issue a Warrant of Arrest and Seizure *in rem* pursuant to Supplemental Rule G(3)(b)(ii), which Plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

#### BASIS FOR FORFEITURE

7. The defendant property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), as the property was involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1957; and/or pursuant to 18 U.S.C. § 981(a)(1)(D), as property that represents or is traceable to the gross receipts obtained, directly or indirectly, from a violation of 18 U.S.C. § 1343.

#### FACTS

8. The Defendant Property was obtained through a fraudulent scheme, wherein an individual created email addresses similar to existing legitimate business email addresses and posed as employees to complete a business transaction and cause funds to be transferred to the fraudulent actor.

9. Trex Company, Inc., a company located in Winchester, Virginia, engaged in negotiations with Vecoplan LLC, located in North Carolina, for the sale of an industrial shredder.

10. The fraudulent actor created email addresses similar to those for actual employees of Trex and Vecoplan.

11. The fraudulent actor is not employed by either Trex or Vecoplan.

12. The fraudulent actor used the fake email addresses to pose as employees of Trex and Vecoplan LLC and complete a sales transaction that was previously in negotiation.

13. The fraudulent actor, posing as an employee of Vecoplan, provided Trex with two sales invoices for the purchase of an industrial shredder.

14. The fraudulent actor also provided Trex with Wells Fargo Bank Account No. 8207797302 for Trex to deposit the funds to pay the invoices via wire transfer

15. Trex authorized a wire transfer to the Wells Fargo Bank Account ending in 7302, and on April 06, 2020, a payment of \$923,681.00 was transferred to the Wells Fargo Bank Account No. ending in 7302 from Trex's Bank of America Business Account.

16. Wells Fargo Bank Account No. ending in 7302 belongs to One Way Logistics LLC.

17. The sole authorized individual on the One Way Logistics account is Terrance Wesly Williams.

18. Wells Fargo Bank investigators suspected that Wells Fargo Bank Account ending in 7302 was being used to facilitate fraudulent activity due to the following suspicious activity and froze the account on or about April 15, 2020.

19. On March 20, 2020, a wire transfer of \$49,850.67 from Altura Credit Union on behalf of George T. Prewitt was credited into the Wells Fargo Bank Account No. ending in 7302.

20. On March 21, 2020, an individual appearing to be Williams withdrew \$9,000.00 in the form of a cashier's check to Williams from the Wells Fargo Bank Account No. ending in 7302.

21. Williams deposited the \$9,000.00 cashier's check into Bank of America Account No. 446002618986, which is Williams's personal bank account, on March 23, 2020.

22. On March 23, 2020, a \$40,000.00 check from the Wells Fargo Bank Account No. ending in 7302 bearing Williams's signature was made payable to Enigma Business Group.



23. The \$40,000.00 check to Enigma Business Group was deposited at a Bank of America Branch Office located in Stone Mountain, Georgia, on March 23, 2020, into Bank of America Account No. ending in 4938.

24. On April 6, 2020, a check in the amount of \$240,152.40 from Dothan City Schools was deposited into the Wells Fargo Bank Account ending in 7302.

25. On April 14, 2020, Wells Fargo Bank debited \$240,152 from Wells Fargo Bank Account No. ending in 7302 to Dothan City Schools due to complaints of fraud.

26. On May 28, 2020, Wells Fargo Bank returned \$873,830.33 from the account ending in 7302 to Trex due to Trex's complaint of fraud. After this transfer, the Wells Fargo Bank Account ending in 7302 had a zero balance.

27. The Bank of America Account ending in 4938 contained \$40,000.00 of fraudulently obtained funds originally from the Wells Fargo Bank account ending in 7302.

28. The Bank of America account ending in 4938 had a "hold" placed on it on or about April 15, 2020, with a balance of \$52,858.37.

29. On or about May 12, 2020, Bank of America closed the account ending in 4938 due to suspected fraudulent activity and transferred the balance to an account held by Bank of America's Hold Harmless/Risk Team.

30. These facts and additional facts supporting this Complaint are stated in the attached Declaration of Investigator Eric W. Varnau, Frederick County, VA Sheriff's Office, and are incorporated by reference herein.

WHEREFORE, the United States of America respectfully requests that the Clerk of Court issue a Warrant of Arrest *in rem* pursuant to Supplemental Rule G(3)(b); that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be

entered declaring the defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

THOMAS T. CULLEN  
United States Attorney

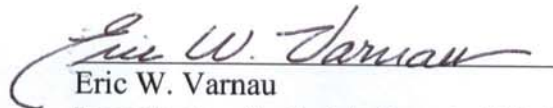
s/Krista Consiglio Frith  
Assistant United States Attorney  
Virginia State Bar No. 89088  
310 First Street, S.W., Room 906  
Roanoke, VA 24011  
Phone: 540-857-2250  
Fax: (540)857-2614  
krista.frith@usdoj.gov

VERIFICATION

I am an Investigator with the Frederick County Sheriff's Office, and one of the agents assigned the responsibility for the above-captioned matter. I have read the contents of the foregoing Complaint for Forfeiture, and the statements contained therein are true to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 31st day of August, 2020.

A handwritten signature in cursive script, reading "Eric W. Varnau", written in dark ink. The signature is fluid and stylized, with a long horizontal stroke at the end.

Eric W. Varnau  
Investigator, Frederick County, VA Sheriff's Office



**DECLARATION AND AFFIDAVIT OF ERIC W. VARNAU IN SUPPORT OF A COMPLAINT FOR FORFEITURE**

I, Eric W. Varnau, having been duly sworn, provide the following information in support of the filing of a **VERIFIED COMPLAINT FOR FORFEITURE IN REM**:

1. Your affiant is a certified and sworn Law Enforcement Officer in the Commonwealth of Virginia. Your affiant is currently employed with the Frederick County, Virginia Sheriff's Office and assigned to the Criminal Investigations Division. Your affiant has more than twenty-six years of experience as a Law Enforcement Officer. Your affiant has been a licensed Polygraph Examiner in the Commonwealth of Virginia since 1999. Your affiant has participated in a variety of criminal investigations including but not limited to; assault and battery, banking crimes, check fraud, credit card fraud, embezzlement, homicide, financial elder abuse, fraud, larceny, money laundering, narcotics distribution, sexual assault and unattended deaths. Your affiant has earned a Bachelor of Science Degree in Political Science from Bridgewater College and a master's degree in Human and Organizational Studies from The George Washington University.
2. The facts in this affidavit were developed from my personal observations, my training and experience and information obtained from law enforcement resources, financial records, persons employed at financial institutions and civilian reporting parties associated with the victim business. This affidavit is intended to show there is probable cause that the defendant property is proceeds of wire fraud and/or involving in money laundering and does not set forth all my knowledge about this investigation.
3. This affidavit is made in support of the filing of a complaint of forfeiture against \$40,000.00 previously in the Enigma Business Group Bank of America Checking Account Number "334059744938," and now held by the Bank of America Hold Harmless/Risk Team. Based on the information developed during the investigation and detailed herein, your affiant believes there is probable cause to demonstrate \$40,000.00 currently credited to the Enigma Business Group Bank of America Checking Account Number "334059744938" constitutes property derived from proceeds as a result of violations of 18 U.S.C. § 1343 and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(D). The \$40,000.00 also constitutes property involved in a violation of 18 U.S.C. § 1957 and is therefore forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).
4. On Monday, April 13, 2020, management at Trex Company Inc., (hereafter referred to as Trex) was made aware of a fraudulent scheme to obtain money in which Trex is the victim by employees of Bank of America and Wells Fargo Bank. Trex Employees Bryan Fairbanks and Bradley McDonald filed a police report with the Frederick County, Virginia Sheriff's Office on Tuesday, April 14, 2020. Trex is located at, "165 Exeter Drive, Winchester, Virginia 22603."
5. The fraudulent scheme began when legitimate business electronic communications between Trex and Vecoplan LLC, a business vendor based in North Carolina, were penetrated by an unknown actor(s). After penetrating the legitimate electronic communications between Trex and Vecoplan LLC, the unknown actor(s) created fraudulent business email addresses similar to those for actual employees of Trex and Vecoplan LLC. The unknown actor(s) then posed as employees of Trex and



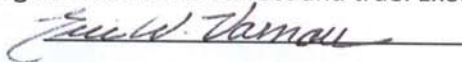
Vecoplan LLC to complete a sales transaction that was already in negotiation prior to the legitimate business emails being compromised. The unknown actor(s) posing as an employee of Vecoplan LLC provided Trex with two sales invoices, totaling \$923,681.00, for the purchase of an industrial shredder. The unknown actor(s) provided a Wells Fargo Bank Account identified as, account number "8207797302" to Trex and instructed Trex to wire the funds for the false invoices to the Wells Fargo account.

6. On April 06, 2020, Trex authorized the wire transfer of "\$923,681.00" from its Bank of America Business Account Number "435029040551" to the rogue Wells Fargo Bank Account Number "8207797302."
7. Wells Fargo Bank Investigators had a suspicion that Wells Fargo Bank Account Number "8207797302" was being used to facilitate fraudulent activity based on transactional activity and a complaint file by the Riverside, California Police Department involving a \$49,850.67 wire transfer credited to the same Wells Fargo Bank Account on March 20, 2020.
8. According to financial records provided by Wells Fargo Bank, Wells Fargo Bank Account Number "8207797302" is identified as belonging to a business identified as "One Way Logistics LLC." The individual identified as being authorized on the "One Way Logistics LLC" account is "Terrance Wesly Williams."
9. The following is a breakdown of suspicious activity involving Wells Fargo Bank Account Number "8207797302" from March 20, 2020, through May 28, 2020, documented in banking records received from Wells Fargo Bank.
  - a. On Friday, March 20, 2020 – A Wire Transfer of "\$49,850.67" from Altura Credit Union on behalf of George T. Prewitt was credited into the Wells Fargo Bank Account ending in "7302."
  - b. On Saturday, March 21, 2020 – A withdraw of \$9,000.00 is made by an individual appearing to be Terrance Williams at a branch office from the Wells Fargo Bank Account ending in "7302." This was a Cashier's Check made payable to Terrance Williams.
  - c. On Monday, March 23, 2020 – Wells Fargo Bank Check Number 1008 debited from the Wells Fargo Bank Account ending in "7302," and bearing the signature of Terrance Williams, is made payable to "Enigma Business Group" in the amount of \$40,000.00.
  - d. On Monday, April 06, 2020 – A Wire Transfer of "\$923,681.00" from Trex's Bank of America Account was credited to the Wells Fargo Bank Account ending in "7302."
  - e. On Monday, April 06, 2020 – A check in the amount of "\$240,152.40" from Dothan City School(s) was credited to the Wells Fargo Bank Account ending in "7302."
  - f. On Tuesday, April 14, 2020, a debit of "\$240,152.40" was returned to Dothan City Schools from Wells Fargo Bank Account ending in "7302." Wells Fargo returned this money due to complaints of fraud.
  - g. On Monday, April 20, 2020, Detective Brazil of the Riverside, California Police Department investigating the \$49,850.67 wire transfer fraud sent by Altura Credit Union on behalf of George T. Prewitt confirmed the full amount of "\$49,850.67" was returned to her victim after Altura Credit Union complained to Wells Fargo that the transfer was fraudulent. The balance in the Wells Fargo Account on April 20, 2020 was "\$873,830.33."



- h. On Thursday, May 28, 2020, Wells Fargo returned "\$873,830.33" to Trex's Bank of America Account due to Trex's complaint of a fraudulent transfer of "\$923,681.00." After this transfer, the Wells Fargo Bank Account ending in 7302 had a zero balance and Wells Fargo closed the account.
10. The March 21, 2020 Wells Fargo Bank Cashier's Check debited against the Wells Fargo Bank Account ending in "7302" and made payable to Terrance Williams in the amount of "\$9,000.00" was deposited into Terrance Williams's Bank of America Account Number "446002618986" on March 23, 2020. This account was subsequently closed on May 12, 2020.
  11. The March 23, 2020 \$40,000.00 Wells Fargo Bank Check Number 1008 from Wells Fargo Bank Account ending in "7302" was deposited at a Bank of America Branch Office located in Stone Mountain, Georgia on March 23, 2020 at 1052 hours EST. According to Bank of America Representatives, the Bank of America Account Number in which the \$40,000.00 was deposited is identified as ending in "4938." According to Bank of America Representatives, the Bank of America Account Number ending in "4938" was placed on "hold" on or about April 15, 2020, which prevented any further deposits or withdrawals from the account.
  12. Banking records obtained from Bank of America identified the Name of Business on the Account Number ending in "4938" as "Enigma Business Group." Bank of America banking records showed an available balance of "\$52,858.37" in this account when the account was frozen on or about April 15, 2020.
  13. On or about May 12, 2020, Bank of America closed the account ending in 4938 due to suspected fraudulent activity and transferred the balance to an account held by Bank of America's Hold Harmless/Risk Team due to suspicions of fraud.
  14. Research on "Enigma Business Group" conducted by your affiant identified "Andrea Renee Miller" also known as "Andrea Renee Johnson" as the Chief Executive Officer, Chief Financial Officer, Incorporator, Registered Agent, Secretary, and Vice-President. A visual observation of a known photograph of "Andrea Renee Miller" also known as "Andrea Renee Johnson" compared with the female depicted in the security camera video footage conducting the transaction leads your affiant to believe they are the same individual. Further search on "Andrea Renee Miller" also known as "Andrea Renee Johnson" revealed a felony conviction of Residential Mortgage Fraud in Georgia in 2008.
  15. Based upon the preceding facts, information and evidence gathered as a result of the investigation, your affiant believes there is probable cause to believe the \$40,000.00 credited to the Enigma Business Group Bank of America Checking Account Number 334059744938 constitutes property derived from proceeds obtained as the result of wire fraud in violation of 18 U.S.C. §1343, and involved in money laundering in violation of 18 U.S.C. §1957. These financial instruments are therefore forfeitable under 18 U.S.C. §§981(a)(1)(A) and 981(a)(1)(D).

I declare under penalty of perjury the foregoing information is correct and true. Executed on this 31<sup>st</sup> day of August 2020.



Eric W. Varnau  
Investigator, Frederick County, VA Sheriff's Office

## CIVIL COVER SHEET

7:20CV00528

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Krista Consiglio Frith 540-857-2250  
310 First Street, S.W., Room 906  
Roanoke, VA 24011

**DEFENDANTS**

\$40,000.00 HELD BY BANK OF AMERICA'S HOLD  
HARMLESS/RISK TEAM

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |                                         | PTF                        | DEF                        |                                                               | PTF                        | DEF                        |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation                                                | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	SOCIAL SECURITY	FEDERAL TAX SUITS
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
			IMMIGRATION		
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
 18 U.S.C. §§ 981(a)(1)(A) and/or (D), for violations of 18 U.S.C. §§ 1957 and 1343  
 Brief description of cause:  
 Civil Forfeiture

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

**JURY DEMAND:** ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE

08/31/2020

SIGNATURE OF ATTORNEY OF RECORD

S/Krista Consiglio Frith

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE Urbanski MAG. JUDGE \_\_\_\_\_